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STIP 1 RICHARD E. TANASI, ESQ. 2 Nevada Bar No. 9699 TANASI LAW OFFICES 3 1148 So. Maryland Parkway Las Vegas, NV 89104 4 Telephone: (702) 906-2411 Facsimile: (866) 299-5274 5 Email: rtanasi@tanasilaw.com Attorney for Defendant LILIA GUZMAN 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 UNITED STATES OF AMERICA, Case No.: 2:14-cr-00103 10 Plaintiff, 11 VS. 12 STIPULATION TO CONTINUE ASHARON BRAVO, CALENDAR CALL AND TRIAL 13 a.k.a. "Sharon," (First Request) a.k.a. "Shadow," 14 JORGE EDUARDO SANCHEZ-GARCIA, 15 a.k.a. Brandon Isai Gutierrez-Manjarrez, a.k.a. "Guero," 16 a.k.a. "El Moro," TOMAS MARTINEZ-BRAVO 17 a.k.a. "Negro," 18 HECTOR FERNANDO ZAMBRANO-REYES. DAVID RIVERA-SIFUENTES, 19 a.k.a. "Guero," a.k.a. "Guerillo," 20 ISRAEL SOTO-MUNOZ, 21 a.k.a. "Cono," GILBERTO SALAZAR-GARCIA, 22 ESTEBAN SANCHEZ-BILLEGAZ, 23 LILIA GUZMAN, and JAVIER LOPEZ-LUCIO 24 25 Defendants. 26 IT IS HEREBY STIPULATED AND AGREED, by and between the United States of 27 28

America, by and through Daniel G. Bogden, United States Attorney, and Amber M. Craig, Assistant United States Attorney, and Defendant, ASHARON BRAVO, by and through her

Las Vega 702-906-2411

attorneys, Dowon S. Kang, Rsmussen & Kang, Defendant, JORGE EDUARDO SANCHEZ-
GARCIA, by and through his attorneys, Gary Modafferi, Turco & Draskovich LLP, Defendant
TOMAS MARTINEZ-BRAVO, by and through his attorney, Michael Ryan Pandullo,
Defendant, HECTOR FERNANDO ZAMBRANO-REYES, by and through his attorney,
Osvaldo E Fumo, Osvaldo E. Fumo, Chtd, Defendant, DAVID RIVERA-SIFUENTES, by and
through his attorney, Jess R. Marchese, Law Office of Jess R. Marchese, Defendant, ISRAEL
SOTO-MUNOZ, by and through his attorney, Chris T Rasmussen, Rasmussen & Kang LLC.,
Defendant, GILBERTO SALAZAR-GARCIA, by and through his attorney, Joel Mann, Law
Office of Joel M. Mann, Defendant, ESTEBAN SANCHEZ-VILLEGAZ, by and through his
attorney, Brian James Smith, Law Office of Brian J. Smith, Ltd., Defendant, LILIA GUZMAN
by and through her attorney, Richard E. Tanasi of Tanasi Law Offices, and Defendant, JAVIER
LOPEZ-LUCIO, by and through his attorney, Thomas A. Ericsson, Oronoz & Ericsson, LLP,
that the Calendar Call in the above-captioned matter, now scheduled for May 5, 2014, at the
hour of 9:00 a.m., be vacated and continued to a date and time convenient to the Court, not less
than 120 days from the current setting. The parties also request all related trial deadlines,
including but not limited to, pretrial motion deadlines shall also be continued accordingly.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that the Trial in the above-captioned matter, now scheduled for May 12, 2014, at the hour of 9:00 a.m., be vacated and continued to a date and time convenient to the Court, not less than 120 days from the current setting.

This is the first request for a continuance of the Calendar Call and Trial dates.

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

- 1. A large volume of discovery has recently been made available.
- 2. Additionally, denial of this request for continuance of trial, calendar call, and pretrial motin deadlines could result in a miscarriage of justice.
- 3. For all of the above-stated reasons, the ends of justice would best be served by a continuance of the Calendar Call and Trial dates.

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4. The additional time requested by this	is Stipulation is excludable in computing the time			
within which the trial herein must commence p	ursuant to the Speedy Trial Act, 18 U.S.C.			
Section 3161(h)(8)(A), considering the factors	under 18 U.S.C. Sections 3161(h)(8)(B)(i) and			
(iv).				
DATED this day of April, 2014.				
DANIEL G. BOGDEN				
United States Attorney				
/s/ Amber M. Craig	s Dowon S. Kang			
AMBER M. CRAIG, ESQ	DOWON S. KANG, ESQ			
Assistant United States Attorney	Counsel for Defendant			
	ASHARON BRAVO			
	/s/ Thomas A. Ericsson			
GARY MODAFFERI, ESQ	THOMAS A. ERICSSON, ESQ			
Counsel for Defendant	Counsel for Defendant			
JORGE EDUARDO	JAVIER LOPEZ-LUCIO			
SANCHEZ-GARCIA				
	/s/ Osvaldo E. Fumo			
MICHAEL RYAN PANDULLO, ESQ	OSVALDO E. FUMO, ESQ Counsel for Defendant			
Counsel for Defendant	HECTOR FERNANDO			
TOMAS MARTINEZ-BRAVO	ZAMBRANO-REYES			
/s/ Jess R. Marchese	/s/ Chris T. Rasmussen			
JESS R. MARCHESE, ESQ	CHRIS T. RASMUSSEN, ESQ			
Counsel for Defendant DAVID RIVERA-SIFUENTES	Counsel for Defendant ISRAEL SOTO-MUNOZ			
DAVID KIVERA-SIFUENTES	ISKAEL SUTU-MUNUZ			
	/s/ Rịchard E. Tanasi			
JOEL MANN, ESQ	RICHARD E. TANASI, ESQ			
Counsel for Defendant	Counsel for Defendant			
GILBERTO SALAZAR-GARCIA	LILIA GUZMAN			

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Based upon the pending Stipulation of the parties, and good cause appearing therefore, the Court finds that:

- A. The parties have stipulated to continue the calendar call and trial dates as presently scheduled.
- B. This Court, being convinced that adequate showing has been made that were this request for continuance to be denied, counsel would not have the necessary time to effectively prepare for trial, taking into account the exercise of due diligence, and a miscarriage of justice could result, based on the following:
 - 1. A large volume of discovery has recently been made available.
- 2. Additionally, denial of this request for continuance could result in a miscarriage of justice.
- 3. For all of the above-stated reasons, the ends of justice would best be served by a continuance of the Calendar Call, Trial dates, and pretrial motion deadlines.
- 4. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. Section 3161(h)(8)(A), considering the factors under 18 U.S.C. Sections 3161(h)(8)(B)(i) and (iv).

ORDER

IT IS HEREBY	ORDERED that the Cale	ndar Call cu	rrently sch	eduled for N	May 5, 2014
at the hour of 9:00 a.m	., be vacated and continued	d to	, 2	20	, at the
hour of	m.; and				
IT IS FURTHE	ER ORDERED that the Tri	al currently	scheduled	May 12, 201	14, at the
hour of 9:00 a.m., be v	acated and continued to		, 20	, at the ho	our of
m.					
DATED this _	day of	, 2014.			
		UNITEI) STATES	DISTRICT	JUDGE